Remarks

This Application has been carefully reviewed in light of the Office Action mailed December 23, 2008. Applicant appreciates the Examiner's consideration of the Application. Claims 1-35 are pending in the application. The Examiner rejects Claims 1-35. To advance prosecution of this case, Applicant amends Claims 1, 7, 17-23, 25-27, 29-31, and 34-35. Applicant cancels Claim 28. Applicant respectfully requests consideration and allowance of all pending claims.

Section 112 Rejection

The Examiner rejects Claim 27 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant respectfully traverses this rejection. In particular, the Examiner alleges that the term "said node" in Claim 27 lacks a proper antecedent basis. Office Action, page 2. Applicant understands that the Examiner refers to the term "said user nodes" in Claim 27 and refers the Examiner to the line of Claim 27 that states "a first series of user definitions, each user in said definitions defined as a user node" as supplying the appropriate antecedent basis for the term. If the Applicant's understanding of the Examiner's position is incorrect, Applicant respectfully requests the Examiner to clarify the rejection. Applicant respectfully requests that the § 112 rejection be reconsidered and that Claim 27 be allowed.

Section 103 Rejections

The Examiner rejects under 35 U.S.C. § 103(a): Claims 30-31 and 34-35 over U.S. Patent Application Publication No. 2003/0233439 filed by Stone ("*Stone*"); Claims 1-6, 25-27, 29, and 33 over *Stone* in view of U.S. Patent No. 6,560,639 issued to Dan ("*Dan*"); Claims 7-12, 17-19, 28, and 32 over *Stone* in view of *Dan* and U.S. Patent Application Publication No. 2002/0040389 filed by Gerba ("*Gerba*"); and Claims 20-24 over *Stone* in view of *Dan* and U.S. Patent No. 5,941,947 issued to Brown ("*Brown*").

Applicant respectfully submits that the combination of references proposed by the Examiner fails to disclose, teach, or suggest elements specifically recited in Applicant's claims. For example, the cited portions of *Stone* proposed by the Examiner fail to disclose, teach, or suggest the following, *inter alia*, recited in amended independent Claim 30:

> grouping nodes in said first set according to respective
> links found by the electronic searching such that all nodes in said
> first set having links to at least two commonly held nodes in said
> second set are assigned to a same group[.]

The Examiner cited to ¶¶ 56, 77, and 93-94 of *Stone* in rejecting a previous version of Claim 30. Office Action, page 3. At ¶ 94, *Stone* recites:

> The administrator may assign attribute values to the group
> attributes and then save the group as a template. The template can
> be used to form new groups that have similar attribute values to a
> selected template that is stored by the central administration tool.
> Accordingly, in at least some situations the user may save time in
> administering groups by retrieving templates and making only
> slight modifications to establish new user groups.

That is, this portion of *Stone* discloses forming a group based on manually added attributes: "The administrator may assign attribute values to the group attributes and then save the group as a template." In addition, *Stone* discloses that these group templates may be used to form other groups by manually revising the template: "the user may save time in administering groups by retrieving templates and making only slight modifications to establish new user groups." In contrast, the claim recites "grouping nodes in said first set according to respective links found by the electronic searching[.]" Further, while the cited portions of *Stone* disclose how group definitions may be manually determined, they do not disclose grouping "such that all nodes in said first set having links to at least two commonly held nodes in said second set are assigned to a same group," as recited in the claim. Indeed, as discussed further below, the cited portions of *Stone* do not discuss how the groups (which are manually formed) are populated; the cited portions of *Stone* merely disclose how to assign attributes to a group.

The Examiner argues that *Stone* "teaches the grouping is done using the search engine[.]" Office Action, page 3 (citing ¶¶ 56, 77, and 93 of *Stone*). Yet, neither ¶¶ 56, 77, nor 93 of *Stone* support the Examiner's argument.

At ¶ 56, *Stone* discloses that a search engine may be used "for supporting the selection of user resources via the communications network" for the purpose of providing "access of users or clients 46 to resources associated with a communications network[.]" That is, *Stone* merely discloses that a search engine may provide a manner of selecting which resources may be assigned to users. Here, *Stone* does not disclose any form of grouping; instead, *Stone*'s disclosure is directed towards assigning resources to users. In contrast, the claim requires

"grouping nodes in said first set according to respective links found by the electronic searching[.]"

At ¶ 77, *Stone* discloses that a "topical hierarchy" is searchable, the topical hierarchy providing clients or users "links to documents, web pages or other resources[.]" *Stone* does not disclose what, if anything, is done with the search results of the topical hierarchy much less "grouping nodes in said first set according to respective links found by the electronic searching[.]"

At ¶ 93, *Stone* discloses that that an administrator may search "for a user based upon an entry of one or more of the following search criteria: last name, first name, office, and e-mail address. The search results are provided in the box, labeled search results." Once again, *Stone* fails to recite what, if anything, may be done with the search results aside from displaying them to the administrator. In contrast, Claim 30, in part, requires "grouping nodes in said first set according to respective links found by the electronic searching[.]"

For at least these reasons, independent Claim 30 is allowable under 35 U.S.C. § 103. For analogous reasons, independent Claims 1, 25-27, 29, 31, and 34-35 as well as the dependent claims of Claim 1 are allowable under 35 U.S.C. § 103. Accordingly, Applicant respectfully requests reconsideration and allowance of Claims 1-27 and 29-35.
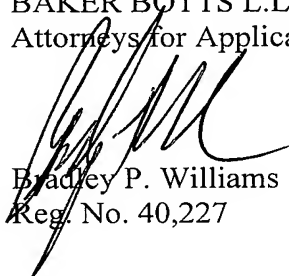
CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicant respectfully requests full allowance of all pending claims.

Applicant believes that no fees are due. However, the Examiner is hereby authorized to charge any fee or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Luke K. Pedersen, Attorney for Applicant, at the Examiner's convenience at (214) 953-6655.

Respectfully submitted,

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